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February 6, 2023

By ECF:

Hon. Ronnie Abrams
U.S. District Court, Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Hearst Communications State Right of Publicity Statute Cases*,
Case No. 21-cv-08895-RA (S.D.N.Y.)

Dear Judge Abrams,

I represent the Plaintiffs in the above-referenced action. I write pursuant Rule 1.D. of Your Honor's Individual Rules of Practice in Civil Cases to respectfully request a 30-day extension of Plaintiff's deadline to oppose Defendant's motion for attorney fees (ECF Nos. 56-58). Plaintiffs' current deadline is February 7, 2023.

There have been two prior requests for extensions of time in this matter. In the first (ECF No. 40), the parties (through a letter submitted by plaintiff) each requested extensions of time for briefing related to Defendant's motion to dismiss. Your Honor granted that request (ECF No. 41). The second request was for an extension of Plaintiff's deadline to oppose Defendant's motion for attorney fees (ECF No. 59). Your honor also granted that request (ECF No. 60).

The Parties have since agreed in principle to a settlement, but require additional time to finalize and execute their agreement. Accordingly, I respectfully request that the court extend Plaintiffs' deadline to file an opposition to Defendant's motion for attorney's fees to March 9, 2023. Defendant has assented to this request.

Thank you for your time and consideration to this matter.

Respectfully submitted,



Philip L. Fraietta

CC: All counsel of record (via ECF)